

Document Log

From		To	
Naomi Tillison <wqs@badriver-nsn.gov>		John Colletti/R5/USEPA/US@EPA Pat Hunt <WaterSewerSupvr@badriver-nsn.gov>	
CC		BCC	
Sreedevi Yedavalli/R5/USEPA/US@EPA			
Subject		Date/Time	
RE: Pre draft NPDES permits		07/19/2012 05:34 PM	

Document Body

Hi John and Pat,

Let's schedule the conference call on August 15th @ 9 a.m. Let me know if you have any conflicts with this time.

Also, I discussed obtaining a 7Q10 estimate closer to the discharge with USGS staff. They are going to work on deriving this value from the upstream gage. They are also going to try and collect a few low flow discharge measurements from the bridge on U.S. Highway 2 to help refine their initial 7Q10 estimate.

Thanks,
Naomi

*Naomi Tillison
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From: John Colletti [mailto:Colletti.John@epamail.epa.gov]
Sent: Tuesday, July 17, 2012 10:14 AM
To: Naomi Tillison
Cc: Pat Hunt; Sreedevi Yedavalli
Subject: RE: Pre draft NPDES permits

Naomi,

If that was the only data point we had, we would use it since it would make the limit more conservative. Usually it would be the permittee that wouldn't want us to use it and they would go out and come up with a 7Q10 closer to the discharge. The Tribe could request USGS to calculate a low flow for you at the discharge. I do not know what that would cost. If USGS has a gauging station on the White River, we could add the two and come up with a more realistic value.

Okay, let's shoot for August 15 for the call. Pick a time that works for you and Pat.

thanks,
John

-----Naomi Tillison <wqs@badriver-nsn.gov> wrote: -----

To: John Colletti/R5/USEPA/US@EPA

From: Naomi Tillison <wqs@badriver-nsn.gov>

Date: 07/17/2012 09:24AM

Cc: Sreedevi Yedavalli/R5/USEPA/US@EPA, Pat Hunt <WaterSewerSupvr@badriver-nsn.gov>

Subject: RE: Pre draft NPDES permits

Hi John,

Our standards do include ammonia criteria (refer to pages 25-26 or provision H10). The calculation for the appropriate ammonia criterion depends on the presence of mussels and fish early life stages. My initial thoughts are that the ammonia criterion would apply to the SBR discharge (but not to the others). I will have to dig into our mussel data to see if we have any mussels documented in the vicinity of the SBR discharge.

There is a USGS discharge station located on the Bad River upstream of the SBR discharge site. However, it is approximately 21 river miles upstream and there is one major tributary (White River) that enters into the Bad downstream of this station and upstream of the SBR discharge. Have you ever had to use 7Q10 data from a site this far upstream of a discharge?

My schedule is fairly flexible the week of August 13th. I am unavailable on Tuesday, August 14th.

I will work on providing you more information on the previous questions/concerns you raised and on my comments on the draft permits.

Thanks,
Naomi

Naomi Tillison
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From: John Colletti [<mailto:Colletti.John@epamail.epa.gov>]
Sent: Tuesday, July 17, 2012 7:11 AM
To: Naomi Tillison
Cc: Sreedevi Yedavalli; Pat Hunt
Subject: RE: Pre draft NPDES permits

Hi Naomi,

Thanks for getting back to us. I will be on vacation from 7/27 - 8/6 and I believe Sreedevi is on vacation 8/6 - 8/13 so we should try for the week beginning 8/13. In the mean time, can you send us an email letting us know if we are heading in the right direction and that way we can develop the statement of basis that goes with the permits and send those to you before the call. Also, is ammonia a concern? We could not find ammonia criteria in your standards. One last thing, do you know the 7Q10 of the Bad River upstream of the discharge point? we will need that for developing ammonia limits if needed.

John

-----Naomi Tillison <wqs@badriver-nsn.gov> wrote: -----
To: John Colletti/R5/USEPA/US@EPA, Pat Hunt <WaterSewerSupvr@badriver-nsn.gov>
From: Naomi Tillison <wqs@badriver-nsn.gov>
Date: 07/16/2012 01:43PM
Cc: Sreedevi Yedavalli/R5/USEPA/US@EPA
Subject: RE: Pre draft NPDES permits
Hi John,

My schedule is pretty full the next couple of weeks. Would it be possible to schedule the conference call for the week of July 30th instead? We do have a tribal holiday on July 30th; however, my schedule for the remainder of that week is fairly flexible. Let me know.

Thanks,
Naomi

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From: John Colletti [<mailto:Colletti.John@epamail.epa.gov>]
Sent: Wednesday, July 11, 2012 3:45 PM
To: Naomi Tillison; Pat Hunt
Cc: Sreedevi Yedavalli
Subject: Pre draft NPDES permits

Naomi and Pat,

As we discussed, please find attached the first drafts of the NPDES permits for the Tribe's 3 wastewater facilities. The drafts can be used in determining whether they would be protective of the Tribe's water quality standards so that 401 certification can be given.

Each permit requires monitoring, both influent and effluent, for mercury. The permits also require the development and implementation of a mercury pollutant minimization plan to determine where, if any, mercury may be coming from. We set an effluent goal of 0.194 ng/L to be protective of your human health criteria (See Part I.D.6 for the ponds and Part I.B.4 for the SBR). That may not be appropriate for the two pond system discharges since their receiving streams are wetlands and would not be used for drinking or fishing. Please let us know which level of protection is appropriate or whether mercury monitoring is needed for the ponds. At this time, we do not believe we have sufficient mercury data to set an actual limit for any of the facilities. Depending on the data collected during the permit term, limits may be needed in future permits. Naomi, do your WQS allow for variances because Pat may need to request one to meet future mercury limits.

Each permit also requires effluent monitoring for sulfates and a reopener clause to include limits if needed to protect your standards (See Part I.D.9 for the ponds and Part I.B.7 for the SBR). Because we are not sure where the two wetland discharges ultimately end up, we included the sulfate monitoring. If you do not believe that the discharge will impact a wild rice water, we can remove the monitoring requirement for the ponds. The SBR monitoring shall remain.

Each permit requires monitoring for phosphorus and the SBR has a limit of 1 mg/L. Again not knowing where the discharges will ultimately end up, please let us know if you believe the ponds should also have limits.

We believe the permits are protective of your water quality standards at this time and based on monitoring required by the permits, the permits can be reopened if data indicate a need for revision. Naomi, we hope this helps you to be able to move forward with the 401 certification process, whether formalized or more informal. We are happy to work with you if you believe additional conditions are needed.

Pat, can you look at the treatment process description for the SBR and make corrections as needed. Also, the asset management language we discussed has been included in all of the permits. The SBR permit also has a one time priority pollutant scan that is required.

We would like to schedule a conference call during the week of July 23 to discuss the permits, 401 certification and whether we should proceed. Please let me know of your availability.

Thanks,
John

(See attached file: wi0036544-4drftper.pdf) (See attached file: wi0036579-4drftper.pdf)
(See attached file: wi0036587-4drftper.pdf)